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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 SCOTT ALLAN, an individual,

Case No: 2:22-cv-01424-GMN-EJY

Plaintiff,

10 vs.

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(Third Request)**

11 PROGRESSIVE NORTHERN INSURANCE
COMPANY dba PROGRESSIVE INSURANCE;
12 DOES I through X, inclusive; and ROE
CORPORATIONS I through X, inclusive,

13 Defendants.

14 Defendant PROGRESSIVE NORTHERN INSURANCE COMPANY, and Plaintiff
15 SCOTT ALLAN, through their respective counsel submit the foregoing stipulation and order to
16 extend discovery deadlines pursuant to LR 26-4 as follows:

17 1. Summary of Discovery Completed

18 To date, the following discovery has been completed in this case:

Item	Date Completed
Plaintiff's Initial Rule 26(a) Disclosures	10/06/2022
Defendant's Initial Rule 26(a) Disclosures	11/09/2022
Defendant's First Set of Requests for Admission, Requests for Production and Interrogatories to Plaintiff	12/07/2022
Plaintiff's First Supplemental Rule 26(a) Disclosures	12/27/2022
Plaintiff's responses to Defendant's First Set of Requests for Admission, Request for Production and Interrogatories	01/10/2023
Plaintiff's Second Supplemental Rule 26(a) Disclosures	01/10/2023
Plaintiff's First Set of Interrogatories and Requests	01/20/2023

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Item	Date Completed
for Production to Defendant	
Plaintiff's Supplemental Responses to Defendant's First Requests for Production of Documents and Defendant's First Set of Interrogatories	02/03/2023
Plaintiff's Third Supplemental Rule 26(a) Disclosures	02/03/2023
Deposition of Plaintiff Scott Allan	02/06/2023
Defendant's First Supplemental Rule 26(a) Disclosures	02/09/2023
Defendant's Designation of Expert Witnesses	02/21/2023
Plaintiff's Designation of Expert Witnesses	02/21/2023
Defendant's Responses to Plaintiff's First Set of Requests for Production of Documents and Answers to Plaintiff's First Set of Interrogatories	03/13/2023

2. Discovery Remaining

The following discovery remains to be completed:

- a) Additional Written Discovery;
- b) Deposition of Person(s) Most Knowledgeable for Defendant;
- c) Deposition(s) of percipient witnesses;
- d) Deposition(s) of treating physicians;
- e) Disclosure of additional expert witnesses; and
- f) Deposition(s) all expert witnesses.

3. Reason Why Discovery Was Not Completed

Discovery in this matter is currently scheduled to close on July 24, 2023 with initial expert disclosures due on May 22, 2023. Although discovery has diligently progressed, additional time is required. Defendant learned on May 8, 2023 that one of its expert witnesses was experiencing a medical condition, for which he will require surgery, which is scheduled for May 15, 2023. Due to the medical condition and the scheduled surgery, that expert will be unable to provide a report by the current deadline. As such, the parties believe that good cause exists to justify extending the discovery deadlines and hereby request a 30 day extension of the discovery deadlines to allow for additional time to complete the remaining discovery.

4. Proposed Schedule for Completing Discovery

Accordingly, the parties respectfully request that this Court enter an order setting the following discovery plan and scheduling order dates:

Event	Former Deadline	New Deadline
Amend pleadings or add parties	November 24, 2022	No Extension Requested
Expert Designations	May 22, 2022	June 21, 2023
Rebuttal Expert Designations	June 22, 2023	July 24, 2023
Discovery Cut-off	July 24, 2023	August 23, 2023
Dispositive Motions	August 21, 2023	September 20, 2023
Joint Pre-Trial Order	September 19, 2023	October 19, 2023

Counsel further state that the requested extension of discovery deadlines is not interposed for purposes of delay, but rather for the purposes set forth above.

DATED: May 11th, 2023

ERIC ROY LAW FIRM

By: 

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DATED: May 11th, 2023

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By: /s/ William H. Pruitt

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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: May 11, 2023

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